

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

----- x  
YURMAN STUDIO, INC. and YURMAN :  
DESIGN, INC., :  
:

Plaintiffs/Counter-Defendants, :

- against - :

ELENA CASTANEDA and EJEWELER LLC :  
d/b/a OVERSTOCKJEWELER.COM, :

Defendants/Counter-Plaintiffs. :

----- x  
----- x  
CARTIER, a division of RICHEMONT NORTH :  
AMERICA, INC., CARTIER INTERNATIONAL, :  
N.V., CARTIER CREATION STUDIO, S.A., VAN :  
CLEEF & ARPELS S.A., VAN CLEEF & :  
ARPELS, INC., VAN CLEEF & ARPELS :  
DISTRIBUTION, INC., GUCCI AMERICA, INC., :  
and BULGARI S.p.A., :

Plaintiffs, :

- against - :

ELENA CASTANEDA and EJEWELER LLC :  
d/b/a OVERSTOCKJEWELER.COM, :

Defendants. :

Civil Action No. 07-1241 (SAS)(HP) :  
(Action No. 1) :

Civil Action No. 07-7862 (SAS)(HP) :  
(Action No. 2) :

**DECLARATION OF BHARAT DUBE IN SUPPORT OF THE CARTIER PLAINTIFFS  
MOTION FOR PARTIAL SUMMARY JUDGMENT**

**EXHIBIT A**



By Authority of the

Under Secretary of Commerce for Intellectual Property  
and Director of the United States Patent and Trademark Office

  
MIELKA BROWN  
Certifying Officer



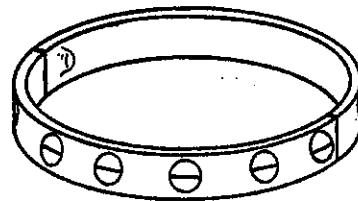
**Int. Cl.: 14**

**Prior U.S. Cl.: 28**

**United States Patent and Trademark Office**

Reg. No. 1,372,423  
Registered Nov. 26, 1985

**TRADEMARK  
PRINCIPAL REGISTER**



**CARTIER, INCORPORATED (DELAWARE  
CORPORATION)**  
653 FIFTH AVENUE  
NEW YORK, NY 10022

FOR: BRACELETS, IN CLASS 14 (U.S. CL. 28).  
FIRST USE 5-0-1970; IN COMMERCE  
5-0-1970.

OWNER OF U.S. REG. NO. 1,078,675.  
THE MARK CONSISTS OF THE OVERALL  
CONFIGURATION OF A BRACELET HAVING

A SERIES OF SIMULATED SCREWS WHICH  
ENCIRCLE THE GOODS AND TWO REAL  
SCREWS WHICH APPEAR AT THE POINTS  
ON THE BRACELET WHERE IT MAY BE  
OPENED.

SEC. 2(F).

SER. NO. 495,582, FILED 8-20-1984.

MARK TRAPHAGEN, EXAMINING ATTOR-  
NEY

**Overstock Jeweler** 

**HAPPY VALENTINE'S DAY**

**FREE GIFT BOX. FREE GIFT MESSAGE - 10% OFF ENTIRE STOCK. USE COUPON: VA10**

Home > Heart Shaped Jewelry in Sterling Silver, Gold Vermeil, Diamond CZs, Tiffany Knockoffs, Cheap Romantic Gift > Cartier-esque Inspired 14K Gold Love Screw Multi Bangle Bracelet

**NECKLACES & PENDANTS** **EARRINGS** **RINGS** **BRACELETS** **WATCHES** **GIFT REGISTRY** **SHOPPING BAG** **SHOPPING BAG**

**ORDERS USUALLY SHIP SAME BUSINESS DAY. FREE GROUND SHIPPING ON ALL USA ORDERS**

**Click for special savings** **NO RISK INVOLVED** **20 Day Moneyback Guarantee**

**Cartier-esque Inspired 14K Gold Love Screw Motif Bangles Bracelet**

**Our Bestsellers**

**Availability:** **In Stock** **Order Now & Ship by:** **Thurs, Feb 7**

**IND-BL05**  
Item #: **List Price:** \$3,499.99  
**Our Price:** \$1,499.99

**SALE! Tiffany Inspired Sterling Silver Elsa Peretti Elongated Teardrop Earring**  
**\$26.99**

**Add to Shopping Bag** **FREE GROUND SHIPPING:** **on all USA orders**

**via ground**  
Int'l. Shipping is **\$25.** more info

**Matching Items**

**Cartier-esque Inspired Gold Vermeil Starling Silver Screw Motif Love Ring**  
**\$39.99**

**Tiffany Inspired Bubble Diamond and 14K Gold Earrings**  
**\$19.99**

**PLAINTIFF'S EXHIBIT**  
**56**  
**278108 Th**

**FREE GROUND SHIPPING**  
on all USA orders

**WE SHIP INTERNATIONALLY**  
See shipping policy

**Search**

**800.586.0020**  
Mon-Fri 9am-8pm EST

**Live Chat** **Click Here**

**VALENTINE FEATURED ITEMS**

Heart Shaped Jewelry  
Final Clearance Sale  
New Arrivals  
Best Sellers  
Judith Leiber Inspired Purse **NEW!**

**COLLECTIONS**

Celebrity Jewelry  
Tiffany Inspired Jewelry  
David Yurman Inspired Jewelry  
Designer Inspired Jewelry  
Designer Inspired Baby Charms  
Men's Jewelry  
Judith Leiber Inspired Bags

**CATEGORIES**

Engagement Rings  
Chandelier Earrings  
Bridal Jewelry  
Heart Shaped Jewelry  
Tennis Bracelets & Necklaces  
Chains  
Cufflinks  
Clover Jewelry  
Religious Jewelry  
Equestrian Jewelry  
Earth Elements



**Cartier "esque" Inspired Diamond and 14K Gold Twisted Hair Hoop Earrings**

[\\$119.99](#)



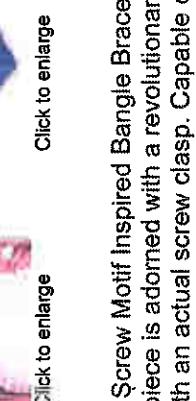
**Tiffany Inspired Frank Gehry Polished Tarnish Resistant Ring**

[\\$119.99](#)



**Hermes or Cartier "esque" Inspired Two Tone Sterling Silver Horseshoe Moneyclip with Screw Motifs**

[\\$119.99](#)



**Cartier Screw Motif Inspired Bangle Bracelet**

[\\$119.99](#)



**Baby Gifts & Charms**

[Click to enlarge](#)



**Accessories**

[Click to enlarge](#)



**DESCRIPTION:**

**Absolutely breathtaking, this Cartier Screw Motif Inspired Bangle Bracelet** is made of stunning 14K gold. This piece is adorned with a revolutionary screw design throughout its band with an actual screw clasp. Capable of fitting an 7.5"-8" wrist, this bangle combines significant weight with a comfortable wearing feel. You'll feel like the real thing in this Cartier replica bracelet, even if the bracelet itself isn't really a Cartier knockoff. A treat for lovers of modern jewelry design, this bangle bracelet makes an elegant and beautiful declaration of promises to the one you love.

**MATERIALS:**

- Sterling Silver & CZ
- Gold Jewelry
- Pearls
- Diamond Jewelry
- Gemstone Jewelry
- Turquoise Jewelry

**Me. \$119.99**

Internationally  
\$25 Flat Rate

**SHOPPING SERVICES:**

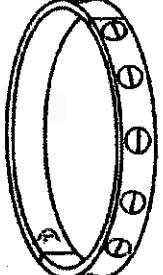
- Wholesale Silver Jewelry
- Gift Certificates
- Wish List Program
- Ring Size Chart
- Shipping Policy
- Celebrity Jewelry Blog

**XML**

**RECENTLY VIEWED ITEMS:**

<div style="display: flex; justify-content: space-around; margin-top

The Cartier Design Marks & The Overstock Jeweler Infringing Products

U.S. Trademark Reg. No.	Cartier Trademark	Overstockjeweler.com Item & Item No.
1,372,423	 A detailed line drawing of the Cartier Panthere logo, which consists of a central oval containing a panther head, surrounded by a larger oval, with the word "Cartier" inscribed along the inner border of the outer oval.	IND-BL505